

*Barbara Sanderson*

P. O. Box 302  
Marion, MA 02738

November 9, 2000

Dockets Management Branch  
(HFA-305)  
Food & Drug Administration  
530 Fishers Lane, Rm 1061  
Rockville, MD 20852

RE. Docket No. 99F-2673  
Irradiation in the Production, Processing and Handling of Food.

**Hearing Request**

Enclosed is a letter describing the reasons for the requested hearing. I am enclosing three copies of this request as well as three copies of the letter stating my objections to the above named docket.

The specific section of the Docket upon which I am requesting a hearing is:

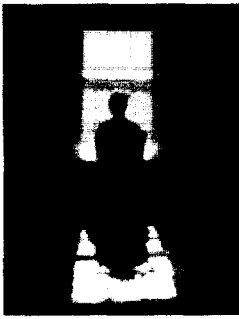
**III. Labeling,  
B.Sprouts Grown From Irradiated Seeds for Sprouting.**

Sincerely,

Barbara A. Sanderson

99F-2673

HER 2



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RE. Docket No. 99F-2673  
Irradiation in the Production, Processing and Handling of Food.

The new regulation allows for the irradiation of seed for sprouting, but does not require a statement on the packaging that the seed has been irradiated.

This is contrary to other Federal regulations regarding sprouts in which the seed is considered to be the primary ingredient in the food, and sprouts are manufactured from the seeds. Based on these previous rulings, which classify sprouting as "food processing", then the sprouts would be considered to have been irradiated and therefore a label indicating such should, by law, be on the package.

I have grown sprouts from seed that has been irradiated and know first hand that there is an objective and noticeable difference in the appearance of the sprout grown from the irradiated seed. Whether this difference is harmful or not, is not the question, but whether the consumer deserves to be informed, clearly is the question.

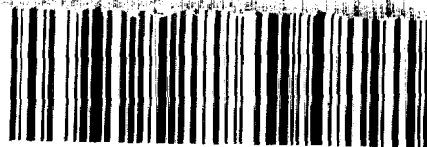
The answer is yes.

Please check the legality of this position. Either the sprouts are manufactured from the seeds, and therefore the seeds are the primary ingredient in the sprouts, or sprouts are an agricultural product, removed from the seed. The FDA cannot have it both ways.

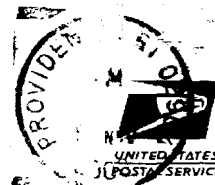
Sincerely,

Barbara A. Sanderson

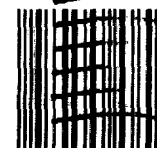
Barbara A. Sanderson  
P.O. Box 302  
Marion, MA 02738



7099 3220 0008 6477 8103



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U.S. POSTAGE  
PAID  
ROCHESTER, MA MA  
02770  
NOV 09, 00  
AMOUNT  
**\$3.20**  
00031382-03

**RETURN RECEIPT  
REQUESTED**

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Rockville, MD 20852

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